

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

INX, LLC, a Delaware limited liability  
company,

Plaintiff,

v.

MUSIC GROUP SERVICES U.S., INC., a  
Washington corporation,

Defendant.

No. 2:13-CV-02126-RAJ

STIPULATED MOTION FOR  
AND ~~PROPOSED~~ ORDER OF  
DISMISSAL WITH PREJUDICE  
AND DISBURSEMENT OF  
FUNDS

**Note on Motion Calendar:**  
July 11, 2014

**STIPULATION**

Plaintiff INX, LLC (“INX”), Defendant MUSIC Group Services U.S., Inc. (“MG US”),  
and Proposed-Intervenor MUSIC Group Ltd. (“MG Ltd.”) (collectively, “the Parties”) hereby  
stipulate and agree as follows:

1. The Parties have fully and finally settled this lawsuit and, to that end, have  
executed a written settlement agreement dated June 27, 2014 (the “Settlement Agreement”).

2. Pursuant to the Settlement Agreement, the Parties agree to a dismissal with  
prejudice of this action, including dismissal of all pled and proposed claims and counterclaims.

3. MG US has deposited \$500,000.00 to the Court registry.

3. Pursuant to the Settlement Agreement, the Parties agree that \$250,000 of the  
funds deposited by MG US to the Court registry shall be disbursed to INX, payable to INX’s

STIPULATED MOTION FOR AND ~~PROPOSED~~ ORDER OF DISMISSAL  
WITH PREJUDICE AND DISBURSEMENT OF FUNDS  
(No. 2:13-CV-2126-RAJ) — 1  
DWT 24445886v1 0099246-000001

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counsel, and that the remaining \$250,000 of the funds deposited by MG US to the Court registry shall be disbursed to MG US, payable to MG US's counsel.

4. Pursuant to the Settlement Agreement, the Parties agree that the Court may retain jurisdiction for the purpose of enforcing the Settlement Agreement.

DATED this 11th day of July, 2014.

Seed IP Law Group PLLC  
*Attorneys for MUSIC Group Services U.S., Inc.*

Davis Wright Tremaine LLP  
*Attorneys for INX, LLC*

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### ORDER

In light of the foregoing stipulation, it is hereby ORDERED:

1. Following disbursement of the funds held in the Court registry as set forth below, this action, and each of the claims asserted therein, is DISMISSED WITH PREJUDICE.

2. All motions, hearings, and other deadlines are hereby STRICKEN as moot.

3. The clerk is authorized and directed to draw a check on the funds deposited in the registry of this court in the principal amount of \$250,000.00, payable to Davis Wright Tremaine LLP and mail or deliver the check to Davis Wright Tremaine LLP, Attn: Josh Rataezyk, 1201 Third Avenue, Suite 2200, Seattle, WA 98101.

4. The clerk is authorized and directed to draw a check on the funds deposited in the registry of this court in the principal amount of \$250,000.00 plus all accrued interest, minus any statutory users fees, payable to Seed IP Law Group PLLC and mail or deliver the check to

1 Seed IP Law Group PLLC, Attn: Russ Tarleton, 701 Fifth Avenue, Suite 5400, Seattle, WA  
2 98104.

3 5. The Court retains jurisdiction over this matter for the purpose of enforcing the  
4 Settlement Agreement.

5 IT IS SO ORDERED.

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7 DATED THIS 21st day of July, 2014.

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11 The Honorable Richard A. Jones  
12 United States District Judge  
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**PROOF OF SERVICE**

I hereby certify that on the date below, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

**Timothy LeRoy Boller** – timb@seedip.com, litcal@seedip.com

**E. Russell Tarleton** – russt@seedlaw.com, litcal@seedip.com

DATED this 11th day of July, 2014.

s/ Joshua A. Rataezyk

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